

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA :
: **PROTECTIVE ORDER**
- v. - :
: 19 Cr. 676 (PGG)
ALEXEI SAAB, :
: Defendant. :
:
- - - - - X

Upon the application of the United States of America, Damian Williams, United States Attorney for the Southern District of New York, by and through Assistant United States Attorneys Samuel Adelsberg and Jason A. Richman, for a protective order relating to material produced pursuant to 18 U.S.C. § 3500 and *Giglio v. United States*, 405 U.S. 150 (1972) (collectively, the "3500 material"), and with the consent of defendant Alexei Saab, by and through his attorneys, Marlon Kirton, Esq., Esere J. Onaodowan, Esq., and Alexandra Tseitlin, Esq., it is hereby ORDERED that:

1. Defense counsel must destroy or return to the Government all 3500 material and any witness list, at the conclusion of the trial of this matter or when any appeal (including post-conviction relief under 28 U.S.C. § 2255) has become final; and
2. The defense is precluded from disseminating or disclosing any 3500 material and any witness list to anyone other

than the defendant, the defendant's counsel, any paralegal or staff employed by the defense for the purpose of representing the defendant, and any expert witness the defense has retained or consulted with in connection with this case; and

3. The defense shall not leave any 3500 material or any witness list in any jail facility, and the defendant may only review 3500 material and any witness list, when in the presence of defense counsel, any paralegal, or other staff employed by the defense for the purpose of representing the defendant; and

4. The defense can seek *ex parte* authorization of the Court to show (but not provide copies of) other specified 3500 material to persons whose access to such materials is otherwise prohibited by this Order. The Court shall grant the request if the Court determines that such access is necessary for the purpose of preparing the defense of the case. Each of the individuals to whom disclosure of 3500 material is made shall be provided a copy of this Order by defense counsel of record and advised by defense counsel of record that he or she shall not further disseminate the

3500 material except at the express direction of counsel of record,
and such direction will only be given if previously approved by
the Court.

Dated: New York, New York

December 27, 2021



THE HONORABLE PAUL G. GARDEPHE
United States District Court
Southern District of New York